

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOVETTI LAW P.C., et al.

Plaintiffs,

v.

JAMES EVERETT SHELTON, et al.,

Defendants.

CIVIL ACTION NO. 2:20-cv-00163-JDW

*Civil Action*

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME PURSUANT TO F.R.C.P. 6(b) TO  
RESPOND WITH A MOTION TO RECONSIDER**

1. Plaintiffs hereby requests a further extension of time to file their response to the Order to show cause docketed at 7 on 2/14/2020 and now in addition to a motion to reconsider to the order dated 2/27/2020.
2. This order gave counsel for Plaintiff's counsel seven (7) days from entry of the Order to respond to the order from January 27, 2020 regarding the filing of Corporate Disclosure Statements.
3. Plaintiff's Counsel intended to file a motion to amend to remove some parties and to update the claims, and will be filing that motion, with proposed amended complaint, along with the proper disclosures.
4. While those were essentially prepared, it became clear that an order was entered yesterday, granting the motion for judgment on the pleadings.
- 5.

6. As such, we ask for an additional ten (10) days from February 27, 2020 until March 9, 2020<sup>1</sup> to submit the pleadings, as they would also counter most, if not, all of the claims in the Motion for judgment on the pleadings, which we believe was granted prematurely.
7. We appreciate the court's understanding in this matter.

As such, Plaintiffs request that an extension of time be granted for the response to March 9, 2020.

/s/ Joshua Thomas  
Joshua L. Thomas and Associates  
Joshua Thomas Esq.  
Supreme Court ID No. 003992012  
225 Wilmington-West Chester Pike  
Suite 200  
Chadds Ford, PA 19317  
Phone: (215) 806-1733  
Email: [JoshuaLThomas@gmail.com](mailto:JoshuaLThomas@gmail.com)

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<sup>1</sup> 10 days would fall on a Sunday otherwise.

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**ORDER**

It is hereby ordered by the court, that Plaintiff's counsel shall have until March 9, 2020 to submit a response to the Order to Show Cause, an amended complaint and motion to reconsider the order entered on February 27, 2020.

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J.